

## DISCOVERY PLAN WORKSHEET

### Phase I (Pre-Settlement Discovery)

**Deadline for completion of Rule 26(a) initial disclosures and HIPAA-compliant records authorizations:**

06/21/2021

**Completion date for Phase I Discovery as agreed upon by the parties:**  
*(Reciprocal and agreed upon document production and other discovery necessary for a reasoned consideration of settlement. Presumptively 60 days after Initial Conference.)*

07/14/2021

**Date for initial settlement conference:**

*(Parties should propose a date approximately 10-15 days after the completion of Phase I Discovery, subject to the Court's availability)*

08/15/2021

### Phase II (Discovery and Motion Practice)

**Motion to join new parties or amend the pleadings:**  
*(Presumptively 15 days post initial settlement conference)*

07/14/2021

**First requests for production of documents and for interrogatories due by:**  
*(Presumptively 15 days post joining/amending)*

07/30/2021

**All fact discovery completed by:**  
*(Presumptively 3.5 months post first requests for documents/interrogatories)*

01/30/2022

**Exchange of expert reports completed by:**  
*(Presumptively 30 days post fact discovery)*

06/01/2021

**Expert depositions completed by:**  
*(Presumptively 30 days post expert reports)*

06/01/2021

**COMPLETION OF ALL DISCOVERY BY:**  
*(Presumptively 9 months after Initial Conference)*

**FEBRUARY 14, 2022**

**Final date to take first step in dispositive motion practice:**  
*(Parties are directed to consult the District Judge's Individual Rules regarding such motion practice. Presumptively 30 days post completion of all discovery)*

03/14/2022

**Do the parties wish to be referred to the EDNY's mediation program pursuant to Local Rule 83.8?**

 **yes**